

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DAVID HOWARD,

Plaintiff,

v.

UNITED STATES POSTAL SERVICE,

Defendant.

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Civil Action No. 02-CV-3797

**RULE 16 MEMORANDUM**

AND NOW, counsel for plaintiff David Howard and counsel for the United States Postal Service hereby submit a Joint Rule 16 Memorandum as required by the Court's Order of January 25, 2005.

1. Proposed Schedule for remaining pretrial proceedings:
  - a. Non-dispositive motions – April 30, 2005
  - b. Completion of discovery – April 30, 2005
  - c. File pre-trial memoranda – June 3, 2005 or 21 days after Court rules on dispositive motions, if any, whichever is later
  - d. Exchange exhibits – June 3, 2005 or 21 days after Court rules on dispositive motions, if any, whichever is later
  - e. Exchange experts' reports – May 10, 2005
  - f. File dispositive motions – May 21, 2005
2. Statements on each of the following:
  - a. Prospects of amicable settlement – Attempts have been unsuccessful

- b. The parties do not agree to refer this case to U.S. Magistrate Judge Jacob P. Hart for trial.
  - c. A jury trial of this matter is anticipated to require three to five days.
  - d. The Court has jurisdiction under 28 U.S.C. section 1331.
  - e. None.
3. By the signatures of counsel below, the parties certify that they have met and conferred.

Respectfully submitted,

COUNSEL FOR PLAINTIFF

PATRICK L. MEEHAN  
United States Attorney

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